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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF JOINT SUBMISSION IN
RESPONSE TO DKTS. 447 AND 449 RE:
SEALING PORTIONS OF MARCH 2, 2022
ORDER**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the Parties’
7 Joint Submission in Response to Dkts. 447 and 449 re: Sealing Portions of March 2, 2022 Order Re
8 Discovery Disputes P25, P26, and P29 (“Order”). In making this request, Google has carefully
9 considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.
10 Google makes this request with the good faith belief that the information sought to be sealed consists
11 of Google’s confidential information and that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of Exhibit A of
13 the Order.

14 4. The information requested to be sealed contains personal and private medical
15 information related to a Google employee, which Google maintains as confidential in the ordinary
16 course of its business and is not generally known to the public.

17 5. On March 8, 2022, the parties conferred on the proposed redactions to the Order.
18 Plaintiffs support sealing the proposed redactions.

19 6. For these reasons, Google respectfully requests that the Court order the identified
20 portions of Exhibit A of the Order to be sealed.

21 I declare under penalty of perjury of the laws of the United States that the foregoing is true
22 and correct. Executed in San Francisco, California on March 8, 2022.

23
24 DATED: March 8, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

25 By /s/ Jonathan Tse
26 Jonathan Tse

27 *Attorney for Defendant*
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